

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>DARRELL F. CRABBS, JR.</b>	:	<b>CASE NO. 1-15-03051-MDF</b>
<b>MELISSA KAY CRABBS</b>	:	
<b>Debtors</b>	:	
	:	<b>CHAPTER 13</b>
<b>SUNTRUST BANK</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>DARRELL F. CRABBS, JR.</b>	:	
<b>MELISSA KAY CRABBS</b>	:	
<b>Respondents</b>	:	

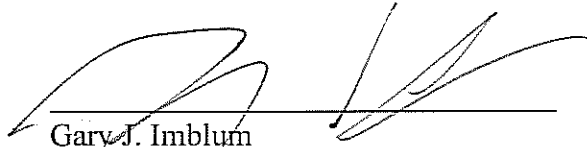
**DEBTORS' RESPONSE TO MOTION OF**  
**SUNTRUST BANK**  
**FOR RELIEF FROM THE AUTOMATIC STAY**

**AND NOW**, come Debtors, Darrell F. Crabbs, Jr. and Melissa Kay Crabbs, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted in part, denied in part. The contract and title speak for themselves. Strict proof is demanded.
4. Admitted in part, denied in part. The contract speaks for itself. Strict proof is demanded as to the value of the vehicle. Debtors admit that they were behind by two (2) post-petition payments through June 2016. Debtors believe that they have now brought their account current post-petition.
5. Denied. Adequate protection is being provided through regular post-petition payments. To the extent that the post-petitions are in arrears, Debtors will make an offer in the near future to bring same current.

**WHEREFORE**, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum  
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Attorney for Debtors

DATED: 7/13/16

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF SUNTRUST BANK FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

dehartstaff@pamd13trustee.com

WILLIAM E CRAIG, ESQUIRE  
MORTON & CRAIG LLC  
COUNSEL FOR MOVANT  
VIA E-SERVICE

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For Debtors

DATED: 7/13/16